		<b>POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT</b>		REGION VI	SITE NUMBER (to be assigned by HHS) TX-05436
<b>NOTE:</b> This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.					
<b>GENERAL INSTRUCTIONS:</b> Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.					
RECEIVED BY: <u>W.D. Wright</u> 1-9-81					
<b>I. SITE IDENTIFICATION</b>					
A. SITE NAME THOMAS STEEL DRUMS		B. STREET (or other identifier) 2517 NE 35th			
C. CITY Fort Worth TX 026462697		D. STATE TX		E. ZIP CODE 76111	
F. COUNTY NAME Tarrant					
G. OWNER/OPERATOR (if known)					
1. NAME Jim Boase - Plant Manager Curtis Thomas - Personal				2. TELEPHONE NUMBER (817)838-6891	
H. TYPE OF OWNERSHIP					
<input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN					
I. SITE DESCRIPTION Firm reconditions old steel drums. Some residue in barrels is allegedly sent to an unidentified landfill; some is dumped on the ground (SEE PHOTO 2) ON SITE; REMAINDER of residue in drums is incinerated.					
J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Citizen's complaint - Ted & Fred Polser, Polser Marble Co., complaint made to Texas Air Control Board				K. DATE IDENTIFIED (mo., day, & yr.) 6/6/80	
L. PRINCIPAL STATE CONTACT					
1. NAME Jim Webb, Texas Air Poll. Control - Tarrant Co.				2. TELEPHONE NUMBER (817)870-7281	
Charles Gill, Supervisor Texas Dept. Water Resources				(214)298-6171	
<b>II. PRELIMINARY ASSESSMENT (complete this section last)</b>					
A. APPARENT SERIOUSNESS OF PROBLEM					
<input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input checked="" type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN					
B. RECOMMENDATION					
<input type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED & TENTATIVELY SCHEDULED FOR					
<input type="checkbox"/> 3. SITE INSPECTION NEEDED & TENTATIVELY SCHEDULED FOR					
<input checked="" type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority)					
Recommend that sampling inspection be conducted to determine whether drum residues are migrating off-site.					
C. PREPARER INFORMATION					
1. NAME Barry Nash <u>Barry Nash</u>				2. TELEPHONE NUMBER (214)742-4521	
				3. DATE (mo., day, & yr.) 10/13/80	
<b>III. SITE INFORMATION</b>					
A. SITE STATUS					
<input checked="" type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)		<input type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.)		<input type="checkbox"/> 3. OTHER (specify): (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)	
B. IS GENERATOR ON SITE?					
<input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify generator's four-digit SIC Code):					
C. AREA OF SITE (in acres) 2-3 Acres		D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES			
		1. LATITUDE (deg.-min.-sec.) 32° 48' 50" N		2. LONGITUDE (deg.-min.-sec.) 97° 18' 8" W	
E. ARE THERE BUILDINGS ON THE SITE?					
<input type="checkbox"/> 1. NO <input checked="" type="checkbox"/> 2. YES (specify): Incinerators, paint shops					

SUPERFUND FILE

DEC 31 1982

REORGANIZED

9

5

Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY							
Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.							
A. TRANSPORTER		B. STORER		C. TREATER		D. DISPOSER	
<input checked="" type="checkbox"/> 1. RAIL	<input type="checkbox"/> 1. PILE	<input type="checkbox"/> 1. FILTRATION	<input checked="" type="checkbox"/> 1. LANDFILL				
<input type="checkbox"/> 2. SHIP	<input type="checkbox"/> 2. SURFACE IMPOUNDMENT	<input type="checkbox"/> 2. INCINERATION	<input type="checkbox"/> 2. LANDFARM				
<input type="checkbox"/> 3. BARGE	<input type="checkbox"/> 3. DRUMS	<input type="checkbox"/> 3. VOLUME REDUCTION	<input checked="" type="checkbox"/> 3. OPEN DUMP				
<input type="checkbox"/> 4. TRUCK	<input type="checkbox"/> 4. TANK, ABOVE GROUND	<input type="checkbox"/> 4. RECYCLING/RECOVERY	<input type="checkbox"/> 4. SURFACE IMPOUNDMENT				
<input type="checkbox"/> 5. PIPELINE	<input type="checkbox"/> 5. TANK, BELOW GROUND	<input type="checkbox"/> 5. CHEM./PHYS. TREATMENT	<input type="checkbox"/> 5. MIDDY DUMPING				
<input type="checkbox"/> 6. OTHER (specify):	<input type="checkbox"/> 6. OTHER (specify):	<input type="checkbox"/> 6. BIOLOGICAL TREATMENT	<input checked="" type="checkbox"/> 6. INCINERATION				
		<input type="checkbox"/> 7. WASTE OIL REPROCESSING	<input type="checkbox"/> 7. UNDERGROUND INJECTION				
		<input type="checkbox"/> 8. SOLVENT RECOVERY	<input type="checkbox"/> 8. OTHER (specify):				
		<input type="checkbox"/> 9. OTHER (specify):					

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED TACB alleged that residue in drums is dumped into metal containers which are hauled to a landfill off-site. Drums are opened, and remaining residue is allowed to drain on the ground. Drums are then placed in ovens to incinerate remaining residue, sandblasted and repainted. Air quality problems arise during incineration and painting phases.

V. WASTE RELATED INFORMATION					
A. WASTE TYPE					
<input checked="" type="checkbox"/> 1. UNKNOWN <input checked="" type="checkbox"/> 2. LIQUID <input type="checkbox"/> 3. SOLID <input checked="" type="checkbox"/> 4. SLUDGE <input type="checkbox"/> 5. GAS					
B. WASTE CHARACTERISTICS					
<input checked="" type="checkbox"/> 1. UNKNOWN <input type="checkbox"/> 2. CORROSIVE <input checked="" type="checkbox"/> 3. IGNITABLE <input type="checkbox"/> 4. RADIOACTIVE <input type="checkbox"/> 5. HIGHLY VOLATILE					
<input type="checkbox"/> 6. TOXIC <input type="checkbox"/> 7. REACTIVE <input type="checkbox"/> 8. INERT <input checked="" type="checkbox"/> 9. FLAMMABLE					
Paints and solvents. TACB indicated that other chemicals may also be present.					
<input checked="" type="checkbox"/> 10. OTHER (specify):					
C. WASTE CATEGORIES					
1. Are records of wastes available? Specify items such as manifests, inventories, etc. below. TACB has list of suppliers of barrels and result of analyses of residue contained in some barrels. *Contact Jim Webb, TACB (817) 870-7281.					
2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.					
a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNKNOWN	UNKNOWN	UNKNOWN	UNKNOWN	UNKNOWN	UNKNOWN
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
<input type="checkbox"/> (2) METALS SLUDGES	<input type="checkbox"/> (2) OTHER (specify):	<input type="checkbox"/> (2) NON-HALOGENATED SOLVENTS	<input type="checkbox"/> (2) PICKLING LIQUORS	<input type="checkbox"/> (2) ASBESTOS	<input type="checkbox"/> (2) HOSPITAL
<input type="checkbox"/> (3) POTW		<input checked="" type="checkbox"/> (3) OTHER (specify):	<input type="checkbox"/> (3) CAUSTICS	<input type="checkbox"/> (3) MILLING/ MINE TAILINGS	<input type="checkbox"/> (3) RADIOACTIVE
<input type="checkbox"/> (4) ALUMINUM SLUDGE		Cleaning Solvents	<input type="checkbox"/> (4) PESTICIDES	<input type="checkbox"/> (4) FERROUS SMLTG. WASTES	<input type="checkbox"/> (4) MUNICIPAL
<input checked="" type="checkbox"/> (5) OTHER (specify):			<input type="checkbox"/> (5) DYES/INKS	<input type="checkbox"/> (5) NON-FERROUS SMLTG. WASTES	<input type="checkbox"/> (5) OTHER (specify):
Inks			<input type="checkbox"/> (6) CYANIDE		
			<input type="checkbox"/> (7) PHENOLS		
			<input type="checkbox"/> (8) HALOGENS		
			<input type="checkbox"/> (9) PCB		
			<input type="checkbox"/> (10) METALS		
(See photo # 6)			<input checked="" type="checkbox"/> (11) OTHER (specify):		
			UNKNOWN		

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)				
3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard). TACB Analysis: lead, titanium, barium, manganese, zinc, paint, solvents, unknown chemicals.				
4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE. Barrels come from several sources. Most materials are paints, inks and solvents. Jim Webb, TACB, states that metal container has caught fire in the past, possibly due to incompatible wastes.				
VI. HAZARD DESCRIPTION				
A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER	X			Potential for dumped residue to reach storm sewers during rainfall.
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR		X	Numerous Times	Texas Air Control Board has fined company several times.
12. NOTICEABLE ODORS		X	Numerous Times	Texas Air Control Board has received several citizen complaints.
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION		X	UNKNOWN	Container of wastes has caught fire more than once. (Jim Webb, TACB)
16. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUIDS	X			Residue is alleged to be dumped carelessly on to ground.
17. SEWER, STORM DRAIN PROBLEMS	X			Potential problem during rainfall.
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES	X			Fire may have been due to incompatible wastes.
21. MIDNIGHT DUMPING				
22. OTHER (specify):	X			Destination of collected barrel residue is unknown.

Continued From Front

VII. PERMIT INFORMATION			
A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE: <u>Unpermitted</u>			
<input type="checkbox"/> 1. NPDES PERMIT	<input type="checkbox"/> 2. SPCC PLAN	<input type="checkbox"/> 3. STATE PERMIT (specify):	
<input type="checkbox"/> 4. AIR PERMITS	<input type="checkbox"/> 5. LOCAL PERMIT	<input type="checkbox"/> 6. RCRA TRANSPORTER	
<input type="checkbox"/> 7. RCRA STORER	<input type="checkbox"/> 8. RCRA TREATER	<input type="checkbox"/> 9. RCRA DISPOSER	
<input type="checkbox"/> 10. OTHER (specify):			
B. IN COMPLIANCE?			
<input type="checkbox"/> 1. YES <input checked="" type="checkbox"/> 2. NO <input type="checkbox"/> 3. UNKNOWN			
4. WITH RESPECT TO (list regulation name & number): <u>No permit is held. Several complaints have been filed.</u>			
VIII. PAST REGULATORY ACTIONS			
<input type="checkbox"/> A. NONE <input checked="" type="checkbox"/> B. YES (summarize below): The Texas Air Control Board has had ongoing problems for several years. Enforcement cases were difficult to prosecute, and company generally chose to pay fines rather than appear in court.			
IX. INSPECTION ACTIVITY (past or on-going)			
<input type="checkbox"/> A. NONE <input type="checkbox"/> B. YES (complete items 1, 2, 3, & 4 below)			
1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY (EPA/State)	4. DESCRIPTION
SIP Inspection	2/4/76	EPA/TACB	Fugitive emissions seen as problem area at site.
X. REMEDIAL ACTIVITY (past or on-going)			
<input type="checkbox"/> A. NONE <input checked="" type="checkbox"/> B. YES (complete items 1, 2, 3, & 4 below)			
1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY (EPA/State)	4. DESCRIPTION
Enforcement Case	UNKNOWN	TACB	Fines paid by Thomas Steel Drum. Conditions remained unimproved.
NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.			

EPA Form T2070-2 (10-79)

PAGE 4 OF 4

Primary problem seems to be air pollution due to inadequate facilities to completely combust residue and insufficient draft to clear away emissions. A recon conducted by two members of the FIT team on October 2, 1980 indicated no current runoff problems. At the time of the visit, however, a potential problem was observed which may have been caused by previous runoffs from the site (See photo # 5).

9 18

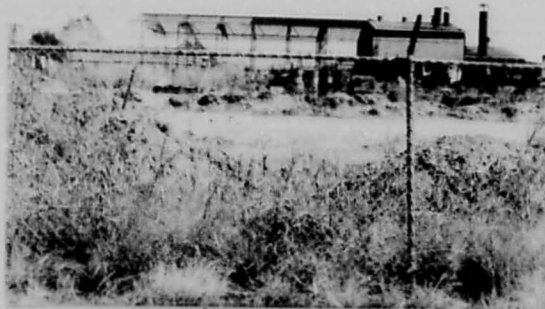


Photo 1

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1430 East

Comments: Pit for unknown  
purpose along west side of  
property near Mapleleaf St



Photo 2

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1435 South

Comments: Unidentified waste  
near incinerator



Photo 3

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1440 North

Comments: Drums on site

②

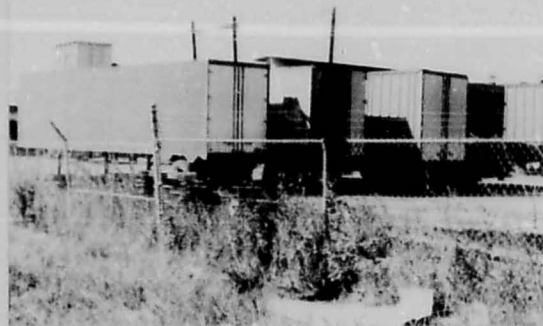


Photo 4

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1445 Northwest

Comments: Trucks loaded

with drums on site



Photo 5

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1450 West

Comments: Green residue

along 35<sup>th</sup> Street, from  
unknown origin. Appears  
to originate on site. Residue  
is about 15 feet from the  
property line fence.



Photo 6

Photographer / Witness

Barry Nash / *[Signature]*

Date / Time / Direction

10/2/80 1455 East

Comments: Drums on Northwest

corner of site, containing  
dried paint.